

APPENDIX 7

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DEPOSITION OF KURT REASONER (January 9, 2012)

<i>e</i>Plus Affirmative Designation	Lawson Fairness Designations/ Summaries	<i>e</i>Plus Objections to Lawson Fairness Designations	<i>e</i>Plus Objections to Lawson Fairness Summaries
8:20 - 9:19	12:5-15:11 (clarification re: scope of depo)	LR 30(F)	
15:21 - 16:5	18:20-19:3		
20:5 - 20:14	19:8-20:4 (Providence licenses the S3 application from Lawson as well as Lawson Business Intelligence and Mobile Supply Chain Management)		
21:3 - 22:11	22:12-13 (Providence does not license punchout)		
22:14 - 23:5	23:6-11 (Providence licenses RQC)		
23:12 - 23:18	28:15-29:2 (Lawson could have inquired with Dan Azevedo at Providence regarding the removal of RSS)		Incomplete summary. Mr. Reasoner testified that Lawson may have asked Mr. Azevedo but he doesn't know.
24:12 - 24:16	29:7-14 (ePlus will refer to the procurement-related applications as S3 Procurement)		
24:22 - 25:4	34:17-35:3; 35:10-13 (identification of exhibit 2)		
26:15 - 27:6	36:8-37:16; 38:8-39:16 (Providence received injunction order from Lawson on May 27. Reasoner understood the communication to inform Providence of the Court's ruling and that it needed to stop using RSS and switch to RQC in preparation for Lawson's cessation of service for RSS after Nov 22)		
27:12 - 27:18	40:16-41:1 (objection)	LR 30(F)	
27:22 - 28:9	44:7-8 (objection)	LR 30(F)	

APPENDIX 8**Kevin Samuelson (Jan. 5, 2012)****ePlus Objections to Lawson Fairness Designations and Summaries**

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28:10 - 28:14	46:20-47:2; 47:6-47:10 (communication went out to all of Providence's users on Sept 27 notifying them that RSS was moving to RQC)	LR 30(F)	Incomplete summary. Mr. Reasoner also testified that RQC was put in a production capacity at Providence on September 27, 2011.
29:15 - 31:2	47:19-48:11 (there are many ways of creating and approving requisitions at Providence, but no other software applications for doing so)		
32:3 - 32:18	49:2-6 (Providence does not create or process any requisitions using RSS as Providence has turned off RSS)		
33:14 - 34:3	50:20-51:2 (Providence's test implementation of RQC was completed in September)		
39:17 - 40:15	52:9-55:5; 56:6-8 (Providence first learned of RQC on May 25 or 26 and saw a demonstration at this time, but could not use RQC during the demonstration; Reasoner did not witness the demonstration)		
41:5 - 42:1	57:6-17 (Providence downloaded and loaded RQC into a test environment within the time constraints of its project plan)		
42:3 - 42:7	58:2-59:1 (Providence began RQC implementation in early June; prior to June 27 RQC download, Providence created a test environment, put together a project plan, identified people to work on the project, approved the project and assigned resources to the project)		

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43:2 - 44:3	61:7-14 (Providence does not know when its remaining problems with RQC will be resolved)		
44:4 - 44:6	64:8-14 (identification of exhibit 4)		
44:12	66:3-9 (identification of exhibit 5)		
44:16 - 44:19	68:6-11 (Mr. Azevedo prepared the estimates in exhibits 4 and 5)		
46:10 - 46:19	72:10-15 (exhibits 4 and 5 assume a 173.33 hour month)		
47:3 - 47:5	75:3-16 (exhibits 4 and 5 multiply a salary by 1.33 to factor in the FB rate)		
47:11 - 47:18	84:17-21 (customizations, enhancements, interfaces and integration are not part of account management)		
48:12 - 49:1	87:20-88:15 (even if Providence removed RSS from its server, it would put another procurement software application on a different server)		
49:17 - 50:5	96:22-97:3 (Providence does not know the license fee for a replacement application for RSS)		
55:6 - 56:5	100:11-14 (Reasoner does not know the percentage of Providence's Lawson maintenance fee allocated to RSS)		
56:9 - 56:14	102:1-7 (objection)	LR 30(F)	
56:17 - 57:5	103:14-18 (Reasoner does not have an estimate of the opportunity costs of replacing RSS with a third party software)		

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57:18 - 57:21	105:13-106:15 (exhibit 4 assigns a cost to internal Providence personnel that would work on replacing RSS with a third party software)		
59:10 - 60:20	121:9-12 (adding question for answer designated by ePlus)		
60:21 - 61:6	122:2-7 (Providence has not estimated the actual cost of implementing RQC since the go-live date)		
61:15 - 61:17	123:22-124:3 (Providence has not been required to be any license service or other fees for the implementation and use of RQC)		Typographical error. Should be "pay" and not "be."
62:13 - 62:15	129:9-14:130:11-12 (clarifying portion of exhibit 3 being referenced)		
62:20 - 64:7	131:7-12; 131:15-19; 132:1-5; 132:8-11 (there were no discussions at Providence regarding any possibility that Lawson could be required to indemnify Providence if it had to replace RSS with software from a third-party vendor; Reasoner is unaware of the question of indemnification ever having been raised with Lawson)		Mischaracterizes testimony. Mr. Reasoner testified that he did not know whether there were any discussions at Providence regarding indemnification.
64:16 - 65:3	133:14-19; 134:4-18 (objection re: scope of deposition)	LR 30(F)	

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65:10 - 66:2	136:13-137:5; 138:19-139:1 (Reasoner believes that if Providence had to replace RSS with third party software, this would adversely affect Providence, and that Providence has suffered an increase in operational expenses since replacing RSS with RQC)		
66:11 - 67:16	143:2-18 (when Reasoner learned of RQC just prior to May 27, he believed that RQC incorporated certain pieces of functionality that Providence had wanted to see improved upon)		
67:17 - 68:5	144:14-145:1 (Providence provided training for its employees on how to use RQC)		
68:12 - 69:6			
69:10 - 69:12			
69:16 - 72:9			
72:16 - 75:2			
75:17 - 79:10			
79:20 - 83:1			
83:12 - 84:16			
84:22 - 87:19			
88:16 - 94:13			
95:16 - 96:21			
100:7 - 100:10			
101:16 - 101:22			
102:8 - 103:13			
108:8 - 108:16			
109:3 - 111:3			
111:4 - 113:18			
114:4 - 115:17			
115:18 - 115:20			

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116:1 - 116:18			
116:19 - 118:12			
118:13 - 121:8			
121:13 - 122:1			
122:8 - 122:13			
122:20 - 123:21			
128:2 - 128:8			
128:12 - 128:22			
130:13 - 131:6			
132:22 - 133:1			
133:7 - 133:13			
134:21 - 135:13			
135:20 - 136:6			
137:8 - 137:16			
145:9 - 145:16			